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*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors**

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG& E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

**DECLARATION OF ROBERT A.  
JULIAN IN SUPPORT OF MOTION OF  
THE OFFICIAL COMMITTEE OF  
TORT CLAIMANTS FOR RELIEF  
FROM AUTOMATIC STAY TO  
PERMIT STATE COURT JURY TRIAL  
OF 2017 TUBBS WILDFIRE CLAIMS**

Date: July 23, 2019

Time: 9:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

1 ROBERT A. JULIAN, under penalty of perjury, declares:

2 1. I am a partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort  
3 Claimants of PG&E Corporation and Pacific Gas and Electric Company (collectively, “PG&E” or  
4 the “Debtors”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the Motion of the Official Committee of Tort  
6 Claimants for Relief from Automatic Stay to Permit State Court Jury Trial of 2017 Tubbs Wildfire  
7 Claims (“Motion”).

8 3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts  
9 set forth herein.

10 4. Attached hereto as EXHIBIT A is a true and correct copy of the report issued by  
11 the California Department of Insurance, “North Bay Insured Losses from the October 2017  
12 Wildfires,” dated January 31, 2018, available at [http://www.insurance.ca.gov/0400-news/0100-](http://www.insurance.ca.gov/0400-news/0100-press-releases/2018/upload/nr013-2018NorthBayFireUpdate013118.pdf)  
13 [press-releases/2018/upload/nr013-2018NorthBayFireUpdate013118.pdf](http://www.insurance.ca.gov/0400-news/0100-press-releases/2018/upload/nr013-2018NorthBayFireUpdate013118.pdf).

14 5. Attached hereto as EXHIBIT B is a true and correct copy of the report issued by  
15 the California Department of Insurance, “North Bay Insured Losses from the October 2018  
16 Wildfires,” dated April 30, 2019, available at [http://www.insurance.ca.gov/0400-news/0100-press-](http://www.insurance.ca.gov/0400-news/0100-press-releases/2019/upload/nr041-19InsuredLosses2018Wildfires050819.pdf)  
17 [releases/2019/upload/nr041-19InsuredLosses2018Wildfires050819.pdf](http://www.insurance.ca.gov/0400-news/0100-press-releases/2019/upload/nr041-19InsuredLosses2018Wildfires050819.pdf).

18 6. Attached hereto as EXHIBIT C is a true and correct copy of PG&E’s Form 10-Q,  
19 for the period ended March 31, 2019 from the Debtors’ website.

20 7. Attached hereto as EXHIBIT D is a true and correct copy of the press release issued  
21 by the California Department of Insurance, “Valley and Butte fires cause an estimated \$1 billion in  
22 insurance losses,” dated Jan. 25, 2016.<sup>1</sup>

23 8. Attached hereto as EXHIBIT E is a true and correct copy of a letter, dated Feb. 6,  
24 2019, from the CPUC to Hon. William H. Alsup as part of the PG&E criminal case, Case No. 14-  
25 CR-00175-WHA.

26 \_\_\_\_\_  
27 <sup>1</sup> Originally available at <http://www.insurance.ca.gov/0400-news/0100-press-releases/2016/release009-16.cfm>. I  
28 pulled the report from this site as well. Because the original link no longer works, the attached copy of the press  
release is from the Wayback Machine, which is a free service provided by the Internet Archive (archive.org), “a  
nonprofit organization dedicated to archiving the Internet and other digital materials, and providing public access to  
these records.” See The Internet Archive’s Policy for Responding to Information Requests, <https://archive.org/legal/>.

9. Attached hereto as **EXHIBIT F** is a true and correct copy of the Judicial Caseload Profile, California Northern, During the 12-Month Periods Ending March 31, 2014 Through 2019, available at page 66 of the following PDF: <https://www.uscourts.gov/statistics/table/na/federal-court-management-statistics/2019/03/31-1>.

10. Attached hereto as **EXHIBIT G** is a true and correct copy of PG&E's Form 8-K, dated January 13, 2019.

11. Attached hereto as **EXHIBIT H** is a true and correct copy of a May 28, 2019 email from Eric Goodman of Baker to Debtors' counsel Kevin Orsini requesting the Debtors to produce PG&E's prior Settlement Data (including subrogation insurers' settlement data) of claims arising out of the 2015 Butte fire and the San Bruno explosion and all data that PG&E has used or may use to estimate tort claims, including, without limitation, data used to estimate tort claims for SEC filings and board reports, including without limitation the Debtors' SEC disclosures that the Debtors' losses on the fires could exceed \$30 billion. Attached hereto as **EXHIBIT I** is a true and correct copy of the TCC's May 31, 2019 notice of deposition and request for production of the same document data on June 6, 2019. The Debtors did not produce any of the data or documents in response to the TCC's May 28 and 31 requests.

12. Attached hereto as **EXHIBIT J** is a true and correct copy of *In re Pac. Gas & Elec. Co.*, Case No. 01-30923 DM, PG&E's Motion for Order Determining Procedures for Estimating Certain Claims for Plan Feasibility Purposes, Dkt. No. 5008, (Bankr. N.D. Cal. Mar. 1, 2002).

*Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.*

Executed on July 2, 2019

/s/ Robert A. Julian  
By: Robert A. Julian